

**INSPECTION REPORT  
FOR  
HAZARDOUS BUILDING MATERIALS**

**Buildings 1 and 5  
Former Facemate Facility  
5 West Main Street  
Chicopee, Massachusetts**

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**APPENDIX B:** Results of Testing for Lead-Based Paint (LBP)

## INTRODUCTION

Beta Group, Inc. (Beta) retained Smith & Wessel Associates, Inc. (SWA) to conduct inspections for asbestos-containing building materials (ACBM), lead-based paint (LBP), polychlorinated biphenyls (PCBs) and mercury containing components at Buildings 1 and 5 of the former Facemate Corporation complex located at 5 West Main Street in Chicopee, Massachusetts. SWA inspected the buildings in anticipation of them being fully demolished. Representatives of SWA evaluated hazards associated with ACBM, LBP, PCBs and mercury containing components at the site on September 2<sup>nd</sup> through September 14<sup>th</sup>, 2010.

### Asbestos

The purposes of the inspection were to evaluate the types, locations, and extent of suspect ACBM and to provide appropriate recommendations for its abatement or management. SWA's inspection addressed both friable materials (materials that can be easily crumbled, crushed, or pulverized by hand pressure) and nonfriable suspect materials. SWA performed the inspection in accordance with the EPA's National Emission Standard for Hazardous Air Pollutants (NESHAP), Title 40 CFR Part 61, for suspect asbestos-containing building materials (ACBM) as practical. SWA identified several suspect materials at the site that were sampled and analyzed for asbestos content. However, if any suspect materials are identified at a later dates that are not addressed in this report, they must be assumed to be ACBM unless appropriate sampling and analysis demonstrate otherwise.

SWA identified the following friable and nonfriable ACBM in the buildings in the form of the following materials:

• Pipe insulation	• Floor tiles	• Roof tar flashing
• Thermal system insulation debris	• Paper insulation on underside of deck	• Boiler components
• Fuse panel cement boards	• Window glazing compound	• Breech insulation
• Transite wall panels	• Window caulking	• Tank insulation
• Tank insulation	• Roof felts	• Boiler insulation
• Duct insulation		

### Lead-Based Paint

The purposes of the lead paint inspection were to evaluate the types, locations, and extent of suspect LBP in the buildings, to evaluate potential hazards associated with LBP, and to provide appropriate recommendations for its abatement and management.

The United States Department of Housing and Urban Development (HUD) has established a standard for lead-based paint, as tested using an X-ray Fluorescence Analyzer (XRFA), of 1.0 milligrams per square centimeter ( $\text{mg}/\text{cm}^2$ ). Although this standard only applies to housing funded by the federal government, it is a useful reference concentration for assessing hazards associated with lead in paint in other settings. Thus, when paint contains greater than  $1.0 \text{ mg}/\text{cm}^2$ , special care should be taken when conducting activities that impact these paints.

The lead content of paints surveyed at the site ranged from less than  $0.1 \text{ mg}/\text{cm}^2$  to  $31.3 \text{ mg}/\text{cm}^2$  as measured with an X-ray Fluorescence Analyzer (XRFA). If LBP are impacted by renovation in a manner that may generate dust or fumes, compliance with Occupational Safety and Health Administration (OSHA) regulations regarding worker exposure to lead may be necessary. Additionally, United States Environmental Protection Agency (EPA) and Massachusetts Department of Environmental (MA DEP) regulations relative to waste disposal may apply.

### **PCBs**

SWA's investigation for PCBs was visual only. Typically, ballast installed after 1978 do not contain PCBs and are marked as such. Ballasts that do not have the "No PCBs" wording on the label are assumed to contain PCBs. SWA inspected the labels on representative ballasts throughout the buildings. Those representative ballasts inspected all exhibited the "No PCBs" wording on the affixed labels and therefore are assumed not to contain PCBs in their capacitor oils. Because only representative ballasts were inspected, individual ballasts should be inspected for the "No PCB" wording on their affixed label if they are to be impacted. In addition, SWA observed a transformer exterior to the buildings that may contain PCBs within its oils and must be further assessed.

### **Mercury Filled Fluorescent Light Fixtures**

SWA observed fluorescent light bulbs that if impacted by renovations must be collected and recycled in accordance with the "Universal Waste" regulatory requirements. The fluorescent bulbs are located in various locations throughout the buildings. SWA estimates that there are approximately 800 fluorescent bulbs total in the two buildings that will require recycling if impacted by demolition. No heat regulating thermostats with associated mercury tubes were observed in the buildings. Any electrical switch-gears would have to be dismantled and assessed for mercury switches prior to being disposed.

### **Pigeon Guano/Carcasses & Miscellaneous Hazardous Materials**

SWA observed pigeon guano and animal droppings in various locations throughout the buildings where raccoons, pigeons and other birds have settled. The bacterial spores associated with these materials pose a threat to human health if inhaled and must be properly handled and packaged by trained personnel for disposal prior to being impacted by demolition.

## ***Exclusions***

While SWA endeavored to conduct a thorough, comprehensive inspection, some exclusion is warranted. SWA's inspection included building areas only; no assessment of soil, debris, subterranean areas, inaccessible crawl spaces, or inaccessible tunnels or trenches was attempted. SWA attempted to inspect accessible building areas and enclosed locations, where practical, using hand tools only. Areas that typically can only be assessed with machinery include but are not limited to foundation walls, spaces behind brick façades, inside equipment, sub floors, and the like.

SWA conducted limited roof sampling and applied temporary patches to sample locations to prevent against future leaks. Often, roofing materials were put down in layers and may include several types, although this may not be apparent upon visual inspection and limited sampling. Therefore, SWA does not guarantee that all suspect ACM roof materials were identified. Only upon removal of the entire roof system will the exact nature of roofing materials be known.

While SWA followed industry standards during the inspection, SWA does not warrant that all suspect hazardous building materials were identified in or on the building and shall not be held liable related to future abatement costs related to hazardous materials that are either not discovered or not appropriately characterized. This is due in part to inherent problems with every building inspection, such as, but not limited to:

- Seemingly homogeneous materials that are not in fact homogeneous;
- Seemingly representative locations that are not in fact representative;
- Layered materials that are not uniformly present or are isolated;
- Materials that are present in an isolated and limited quantity; and
- Materials that are present in locations that are unsafe or otherwise difficult to access.

During the course of future demolition work, it is likely that additional hazardous materials or materials suspected of being hazardous will be identified. Such materials should be assumed to be hazardous unless appropriate evaluation or sampling and analysis demonstrate otherwise. Contracts, specifications and plans should advise contractors to conduct controlled demolition work and stop immediately should any hazardous building materials be encountered during the course of their work.

## **1.0 ASBESTOS CONTAINING BUILDING MATERIALS**

### **1.1 Scope of Work**

SWA's Massachusetts certified asbestos inspectors Ted Sherry (Cert. # AI-032572), Glenn Nelson (Cert. # AI-030052), Ed Dubiel (Cert. # AI-033581) and Eric Hanson (Cert. # AI-000220) performed the inspection. The inspection was conducted throughout interior and exterior locations of Buildings 1 and 5. These buildings are slated for demolition. SWA conducted limited intrusive investigations including looking under wood flooring, behind limited fixed walls and ceilings as practical, etc.

SWA inspected for the following types of suspect ACBM:

- Thermal system insulation (TSI), such as insulation on pipes, boilers, ducts and related equipment;
- Surfacing material, such as fireproofing applied to structural components, acoustical and decorative plasters, and other sprayed or troweled applications; and
- Miscellaneous materials, such as ceiling tiles, floor tiles, blown-in insulation, and other materials not classified as TSI or surfacing materials.

To determine the asbestos content of suspect ACBM, SWA collected and analyzed representative bulk samples by extracting a small portion of suspect material from the substrate. The samples, typically measuring one cubic centimeter, were collected using a variety of methods. The extracted samples were placed into individual, sealed plastic bags for transport to the laboratory.

EMSL Analytical Services, Inc., (EMSL) of Woburn, Massachusetts, a fully accredited asbestos analytical laboratory, analyzed bulk samples. EMSL analyzed the samples using Polarized Light Microscopy (PLM), in accordance with the requirements of 40 CFR Part 763, Subpart F, Appendix A (see Appendix A for laboratory reports). Because PLM is not consistently reliable in detecting asbestos in floor coverings and similar nonfriable organically bound materials, when a negative result is obtained by PLM (less than one percent asbestos), the laboratory was instructed to analyze the sample by Transmission Electron Microscopy (TEM) to confirm the results.

For each homogeneous sampling group, the laboratory analyzed samples until a positive result was obtained (i.e. greater than one percent asbestos). If one sample indicates an asbestos content greater than one percent, the entire homogenous area must be considered to be an ACBM even if one or more samples in the group indicates an asbestos content of less than one percent.

### **1.2 Regulatory Guidance**

The US EPA, OSHA, Massachusetts Department of Occupational Safety (MA DOS) and

MA DEP are responsible for regulating the release of asbestos into the environment and protecting workers from exposure to airborne asbestos fibers.

OSHA and MA DOS are responsible for the health and safety of workers who may be exposed in connection with their jobs including custodial activities, renovation work, and asbestos abatement. These agencies specify requirements for the work practices and engineering controls that must be utilized during asbestos abatement projects. They also require that ACM be repaired, removed, or otherwise appropriately abated before maintenance, renovation, or demolition work disturbs them. Thermal system insulation, surfacing materials, and floor tile installed before 1980 must be presumed to be ACM unless appropriate inspection and sampling analysis prove otherwise.

The EPA and MA DEP are responsible for developing and enforcing regulations necessary to protect the general public from airborne contaminants that are known to be hazardous to human health. They regulate ACM associated with renovation, demolition, and asbestos abatement projects via the National Emissions Standard for Hazardous Air Pollutants (NESHAP) Title 40 CFR Part 61 regulation and MA DEP asbestos regulation (310 CMR 7.00, 7.09 and 7.15). These regulations require that buildings be inspected for ACM prior to renovation/demolition projects. They stipulate that all friable ACM as well as nonfriable ACM that are in poor condition or will be made friable by renovation or demolition activity be removed or otherwise appropriately abated before they are disturbed.

### **1.3 Findings**

SWA identified the following friable and nonfriable *suspect* ACM:

- Gypsum boards
- Pipe insulations
- Cement plasters
- Cement skim coat
- Breeching insulations
- Thermal system insulation debris
- Duct insulation
- Floor papers
- Floor tiles
- Window caulking
- Roofing materials
- Boiler insulations
- Wall panels
- Ceiling tiles
- Floor tile mastic adhesives
- Window glazing compound
- Ceramic tile glue
- Tank insulation
- Power box components

SWA collected a total of 83 representative bulk samples of the above materials to determine asbestos content of which 77 were analyzed using PLM. Six of the samples did not require analysis as the first sample in the homogeneous sampling group tested positive for asbestos (i.e. contain greater than one percent asbestos). Three samples were further analyzed by the TEM method to confirm the PLM results.

SWA has listed in **Table 1**, the location and estimated quantity, by square foot (sf), linear foot (lf), or other appropriate unit, of each type of ACBM identified at the site.

<b>Table 1 • List of Materials Testing Positive for Asbestos</b>			
<b>Type of Material</b>	<b>Location</b>	<b>Quantity</b>	<b>Sample number</b>
<b>Building 1 &amp; Boiler House</b>			
Gray window caulking (associated with wood window systems) ( <b>See note 1</b> )	Throughout building 1 and boiler house I've taken 4 glazing samples and can't seem to get a positive. I have a hard time callin it negative. We'll see what the TEMs say and further discuss.	265 windows	B1-01A,
Black fuse box/power panel components (various sizes)	Throughout building	215 boxes	B1-04A
Gray wall panels associated with the dryer equipment and studded walls	Floor 1 – Dryer unit walls, basement buildings connector and adjoining storage room I did not walk the entire crawl space, but did not observe debris on the dirt from the large pit leading to the collapsed section (south). The sections on the north side from the pit did have debris that was primarily mixed in with the contaminated water.	1,025 sf	B1-05A
Gray wall panel, thermal system insulation, packed asbestos flooring with wire mesh and miscellaneous debris	Floor 1 – Middle sections near dryer equipment (This general section of floor 1 is a heavily contaminated with asbestos and will require significant decontamination)	13,500 sf	B1-05A, B1-07A



<b>Table 1 • List of Materials Testing Positive for Asbestos</b>			
<b>Type of Material</b>	<b>Location</b>	<b>Quantity</b>	<b>Sample number</b>
Thermal system insulation debris mixed with building items that were not collected by the former company (the vast majority of items will need to be treated as asbestos waste)	Basement, floor 1 and boiler building - Throughout	70,000 sf	B1-05A, B1-07A
Thermal system insulation debris mixed with building items that were not collected by the former company	Floor 2 and 3 – Throughout various locations, elevator shafts, stairwells and between wood floors at large exhaust ducts	500 sf	B1-05A, B1-07A
Pipe insulation and associated mudded fittings	Throughout floors 1, 2, 3, basement, loading dock stairwells, crawl space, trenches, boiler house, filter room building and building connector	5,150 lf	B1-09A
Beige 12" x 12" floor tile and associated tan mastic adhesive	Floors 1 south/east office, floor 2 office and floor 3 office	365 sf	B1-10A
White tank insulation and associated vertical breeching (6 tanks)	Basement (polyed off section near dock)	3,200 sf	B1-13A
White tank, breeching and pipe insulation debris (This general section of floor 1 is a heavily contaminated with asbestos and will require decontamination)	Basement (polyed off section near dock)	2,500 sf	B1-13A
Gray asbestos ceiling paper	Sub Basement – Beneath filter room (north/west side) close to boiler room entrance	600 sf	B1-14A
Black wall flashing (adhered to brick wall)	Exterior – Rear loading dock (roof accessed from the floor 1 rear section), stair tower and front floor 1 exterior section under windows near stair tower	350 sf	B1-16A
Black/gray window glazing compound and associated gray caulking (these windows were retrofit into the original wood frames. Hence, the caulking associated with the original wood frame must be treated as asbestos waste)	Throughout front façade, rear and side sections (associated with galvanized steel windows with fiberglass green panels)	186 windows	B1-19A, B1-20B
Tan window glazing compound (interior sections of building)	Throughout interior offices and storage spaces	46 windows	B1-22A

Table 1 • List of Materials Testing Positive for Asbestos			
Type of Material	Location	Quantity	Sample number
Gray breeching insulation with black tar coating	Boiler house side roof	550 sf	B1-30A
Gray breeching insulation	Boiler house	2,100 sf	B1-30A
Gray boiler insulation associated with the top sections of the boilers	Boiler house	375 sf	B1-30A
Pipe insulation, window caulking/glazing and other miscellaneous contaminated debris	South collapsed corner (material co-mingled with asbestos debris and most of the building materials will likely be off-loaded into lined containers)	30 (100 yd <sup>3</sup> containers)	Assumed
<b>Building 5</b>			
Gray window caulking (associated with window opening) (See note 1)	Throughout building	156 window openings	B5-01A,
Pipe insulation and associated mudded fittings	Throughout various locations of floors 1, 2, 3 and stairwells	310 lf	Assumed
Pipe insulation debris	Floor 3 north/west side	200 sf	Assumed
Black roof drain flashing cement	Throughout roof	8 drains	B5-08A
Black/gray roof flashing material	Stair roof	75 sf	B5-11A

**Note 1** – The quantity represents the entire window wall opening and the average opening of the wood window system is approximately 10' x 3.5' for Building 1 and 11' x 6' for Building 5.

In **Table 2**, SWA has listed all materials that tested negative for asbestos, including the locations where these materials were observed and the corresponding bulk sample reference number(s). Those sample #'s presented in *italics* were further analyzed by TEM to confirm the PLM results.

Table 2 • List of Materials Testing Negative for Asbestos		
Type of Material	Location	Sample No.
<b>Building 1 &amp; Boiler House</b>		
Black vapor barrier floor paper (under tongue & groove wood floor)	Throughout building	B1-03A, B1-03B, B1-03C
Gray/tan window glazing compound	Throughout building	<i>B1-02A</i> , B1-02B, <i>B1-28A</i> , B1-28B
White 2' x 4' ceiling tile/debris	Throughout various locations	B1-06A, B1-06B

Table 2 • List of Materials Testing Negative for Asbestos		
Type of Material	Location	Sample No.
Textured paint There are probably 30 different colored paints throughout the site. You had collected 1 sample during your visit and I took 2 more random samples. Its not the type of paint that has an asbestos grit or texture anyway. But let me know if you deem it necessary to go back and sample all the colors.	Floor 1 – West side	B1-08A, B1-29A, B1-29B
Tan mastic adhesive associated with beige 12" x 12" floor tile	Floors 1 south/east office, floor 2 office and floor 3 office	B1-11A, B1-11B
Gray wall cement skim coat	Basement – Loading dock	B1-12A, B1-27A, B1-27B
Black rolled roofing	Exterior – Rear loading dock (roof accessed from the floor 1 rear section)	B1-15A, B1-31A
Black roof tar paper	Exterior – Throughout main roof	B1-17A, B1-17B
Red roof tar paper	Exterior – Throughout main roof	B1-18A, B1-18B
White gypsum board walls	Floor 3 – Conveyer enclosure walls	B1-21A, B1-21B
Black work table top cover material	Floor 2 - Offices	B1-23A, B1-23B
Tan glue associated with ceramic wall tiles	Floor 1 - Bathroom	B1-24A, B1-24B
Gray insulation (between metal dryer liner walls)	Floor 1 – Middle section	B1-25A, B1-25B, B1-25C
Gray cement plaster (adhering to ceilings and I-beams)	Floor 1 & 2 – Records storage and administration offices near boiler house	B1-26A, B1-26B, B1-26C, B1-26D
Tan boiler insulation associated with the two boilers (beneath metal jacket)	Boiler house	B1-32A, B1-32B, B1-32C
<b>Building 5</b>		
Black vapor barrier floor paper under tongue & groove flooring	Throughout building	B5-03A, B5-03B
Gray/white window glazing compound	Throughout building	B5-02A, B5-02B, <b>B5-13A</b> , B5-13B
Black fuse box/power box panels (newer vintage)	Throughout building	B5-04A, B5-12A
Gray cement plaster (adhering to ceiling and I-beams)	Floor 3 – North sections	B5-05A, B5-05B, B5-05C

Table 2 • List of Materials Testing Negative for Asbestos		
Type of Material	Location	Sample No.
Gray roof flash seam caulking (associated with the upper metal wall flashing)	Throughout roof perimeter	B5-06A, B5-06B
White gypsum type wall panels	Floor 2 – Dust venting areas	B5-09A, B5-09B
Black roof felt/tar	Stair roof	B5-10A, B5-10B

#### 1.4 Conclusions and Recommendations

On the basis of our findings, SWA offers the following conclusions and recommendations:

- Both friable and nonfriable ACM were identified in and on the two buildings. Because the buildings are slated for demolition, removal of the ACM impacted by the work will be necessary. This work must be conducted by a licensed Asbestos Abatement Contractor. SWA recommends that this work be conducted in accordance with a project design as prepared by a licensed Project Designer. ***This report is not intended for use as an abatement design.***
- SWA observed significantly damaged asbestos-containing insulations and debris throughout various locations in the buildings. When friable materials are damaged and disturbed, asbestos fibers are easily made airborne and pose a significant health risk to humans if inhaled or ingested. SWA recommends that the buildings remain secured, are posted with asbestos warning signs and that access is limited to qualified personnel only who don personal protective equipment including but not limited to protective boots, Tyvek type disposable suits and respirators equipped with P100 particulate filters.
- Because SWA's inspection did not include comprehensive destructive or intrusive inspection techniques with the use of heavy equipment it is possible that some suspect ACM is present that were not identified. If suspect ACM are identified at a later date that are not addressed in this inspection report, they should be assumed to be ACM unless appropriate sampling and analysis demonstrate otherwise.
- Because the site has been abandoned for some time, building finishes and stored materials have deteriorated and comingled with asbestos containing insulation materials. Those materials that are porous and cannot be adequately cleaned will require packaging and disposal as ACM waste. All standing water will have to be collected for disposal as ACM waste or adequately filtered through 5 micron inline filtration systems.

### 1.5 Cost Estimates

In **Table 3**, SWA has provided estimates of abatement costs associated with all identified ACBM in the inspected areas. These estimates are based on current industry standards that may fluctuate rapidly based on a variety of factors: the prevailing economic climate, seasonal differences, union labor considerations, scale of the abatement, occupancy of the building, and so on. SWA recommends that qualified abatement contractors be solicited to determine actual pricing involved. In addition to pricing for abatement, we have considered anticipated industrial hygiene costs associated with abatement, including air monitoring and oversight of the abatement.

<b>Table 3 • Estimated Costs for Removal of ACBM</b>		
<b>Type of Material</b>	<b>Quantity/Unit cost (\$)</b>	<b>Total Cost (\$)</b>
<b>Building 1 &amp; Boiler House</b>		
Gray window caulking (associated with wood window systems)	265 windows @ 110/ea.	29,150.
Black fuse box/power panel components (various sizes)	215 boxes @ 40/box	8,600.
Gray transite wall panels associated with the dryer equipment and studded walls	1,025 sf @ 4/sf	4,100.
Gray wall panel, TSI, packed asbestos flooring with wire mesh and miscellaneous debris	13,500 sf @ 3/sf	40,500.
TSI debris mixed with manufacturing materials that remained in place from past operations (the vast majority of items will need to be treated as asbestos waste)	70,000 sf @ 2/sf	140,000.
TSI debris mixed with stored materials that were left behind by Facemate	500 sf @ 2/sf	1,000.
Pipe insulation and associated mudded fittings	5,150 lf @ 12/lf	61,800.
Beige 12" x 12" floor tile and associated tan mastic adhesive	365 sf @ 3/sf	1,095
White tank insulation and associated vertical breeching (6 tanks)	3,200 sf @ 5/sf	16,000.
White tank, breeching and pipe insulation debris on floor and adjacent surfaces	2,500 sf @ 3/sf	7,500.
Gray asbestos ceiling paper	600 sf @ 4/sf	2,400.
Black wall flashing (adhering to brick wall)	350 sf @ 3/sf	1,050.
Black/gray window glazing compound and associated gray caulking (these windows were retrofit into the original wood frames. Hence, the caulking associated with the original wood frame must be treated as asbestos waste)	186 windows @ 120/ea.	22,320.
Tan glazing compound (inside sections of building)	46 windows @ 40/ea.	1,840.

<b>Table 3 • Estimated Costs for Removal of ACBM</b>		
<b>Type of Material</b>	<b>Quantity/Unit cost (\$)</b>	<b>Total Cost (\$)</b>
Gray breeching insulation with black tar coating	550 sf @ 20/sf	11,000.
Gray breeching insulation	2,100 sf @ 8/sf	16,800.
Gray boiler insulation associated with the top sections of the boilers	375 sf @ 15/sf	5,625.
South collapsed corner (material co-mingled with asbestos debris and most of the building materials will be live-loaded into lined containers)	30 - 100 yard containers @ 2,500 per container	75,000.
Demolition of 2 two-story boilers	2 boiler @ 10,000/boiler	20,000.
<b>Total Abatement Fee Building 1 (Contractor)</b>		<b>465,780.</b>
<b>Building 5</b>		
Gray window caulking (associated with window opening)	156 windows @ 110/ea.	17,160.
Pipe insulation and associated mudded fittings	310 lf @ 15/lf	4,650.
Pipe insulation debris	200 sf @ 10/sf	2,000.
Black roof drain flashing cement	8 drains @ 50/drain	400.
Black/gray roof flashing material	75 sf @ 3/sf	225.
<b>Total Abatement Fee Building 5 (Contractor)</b>		<b>24,435.</b>
<b>Total Abatement Fee Buildings 1 &amp; 5 (Contractor)</b>		<b>490,125.</b>
<b>Total Industrial Hygiene Fee</b>		<b>40,000.</b>
<b>Total Fee</b>		<b>\$ 530,215.</b>

## **2.0 LEAD-BASED PAINTS**

### **2.1 Scope of Work**

SWA's accredited lead paint inspector tested representative painted surfaces throughout the building. SWA analyzed paints for lead content using the NITON XLS-303A, X-ray fluorescence analyzer (XRFA) following the manufacturer's instructions for initial calibration and operation. The XRFA uses a radioactive source to excite the electrons of lead atoms (if present) in paint. As the lead atom electrons return to their normal state, they emit x-rays that are measured by the XRFA, then processed and the results converted to milligrams of lead per square centimeter of sampled surface area. On most substrates, the XRFA is precise to  $+0.1 \text{ mg/cm}^2$ .

Surfaces tested included, but were not limited to walls, ceilings, windows, doors, casings/jambs, trim, and other miscellaneous surfaces on a variety of substrates including wood, metal, brick, etc.

### **2.2 Regulatory Guidance**

In all areas where LBP is disturbed by renovation work and where components covered by LBP are disposed of, applicable OSHA and EPA regulations apply.

#### **OSHA**

Renovation or demolition activities that disturb surfaces that contain lead must be conducted in accordance with the OSHA regulation 29 CFR 1926.62 "Lead Exposure in Construction: Interim Final Rule." This regulation requires that a site-specific health and safety plan be prepared before conducting activities that create airborne lead emissions. Such a plan should include the identification of lead components, an exposure assessment, and, if applicable, the required work procedures and personnel protection to be used.

An exposure assessment in the form of personal air monitoring must be performed if there is the potential for employees to be exposed to lead due to the renovation or demolition activity. If demolition is being conducted that will disturb lead-based paints, the employer must assume that employee exposure is in excess of the Permissible Exposure Limit (PEL) of 50 micrograms per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ), until the exposure assessment is completed. If the PEL is exceeded, employees are required to use half-face mask respirators with HEPA filter cartridges. Furthermore, a written respirator program is required per 29 CFR 1910.134. The lead standard also requires the following protective measures be taken until the exposure assessment is completed:

- Isolation of the work area;
- appropriate personal protective clothing and equipment;
- change areas and hand washing facilities;

- biological monitoring; and
- training

The results of the initial exposure assessment will determine the protective measures that must be followed for the remainder of the project. OSHA may allow air-monitoring data from previous projects conducted under conditions closely resembling the present project to be used for the exposure assessment. If the exposure assessment indicates that exposure levels are below the Action Level of  $30 \mu\text{m}^3$ , there are no additional requirements under the standard if the conditions remain the same.

## **EPA**

In addition to the worker protection requirements stipulated by OSHA, MA DEP and the EPA regulate the disposal of wastes that are potentially hazardous. Such wastes may include paint chips and residue generated during abatement or repainting work, or whole components, such as wood windows, doors, and trim that are coated with LBP and that are disposed of as the result of renovation or demolition work. Metal components are not regulated if they will be recycled and not disposed of in a landfill.

To determine the required method for disposing of permeable items coated with LBP, the DEP and the EPA require representative sampling of the debris to determine the quantity of lead that would be expected to leach into the environment if the debris were disposed of in a landfill. The representative sample(s) must be analyzed by the Toxicity Characteristic Leaching Process (TCLP). If the result of this procedure indicates that the sample leaches a lead concentration below five parts per million (ppm), the debris is not regulated and can be disposed of in a traditional construction landfill. However, the debris must be disposed of as hazardous waste if the TCLP result exceeds 5 ppm. To minimize the total volume of hazardous waste, segregating hazardous from nonhazardous waste is advisable.

## **HUD**

The United States Department of Housing and Urban Development (HUD) has established a standard for lead-based paint, as tested using an XRF analyzer, of  $1.0 \text{ mg/cm}^2$ . Although this standard only applies to housing funded by the federal government, it is a useful reference concentration for assessing hazards associated with lead in paint in other settings. Thus, when paint contains greater than  $1.0 \text{ mg/cm}^2$ , special care should be taken when conducting activities that impact these paints. When conducting abrasive blasting, torch burning, or similar activities that generate significant dust or fume, hazards can be caused even at concentrations below the HUD standard.

## **2.3 Findings**

Analysis of painted surfaces throughout the building indicates that lead levels range from  $0.1 \text{ mg/cm}^2$  to  $31.3 \text{ mg/cm}^2$ . A summary of paints with elevated concentrations of lead



(greater than 1.0 mg/cm<sup>2</sup>) are presented in **Table 4**, and the results of all testing are presented in Appendix B.

<b>Table 4 • Summary of Surfaces Coated With LBP</b>				
<b>Location</b>	<b>Substrate</b>	<b>Color</b>	<b>Component</b>	<b>XRF Reading</b>
<b>Building 1</b>				
Floor 1 - Throughout	Brick	Green	Wall	2.5
	Wood	White	Window frame	30.1 – 31.3
	Wood	Green/white	Support columns	2.4 – 30.5
	Brick	White	Wall	0.1 – 1.1
	Metal	Dark gray	Sliding door	10.5 – 14.9
Floor 2 - Throughout	Brick	White	Wall	2.0 – 3.7
	Wood	White	Window frame	0.9 – 25.3
	Wood	Gray	Lower column	5.0 – 28.9
Floor 3 - Throughout	Wood	White	Window frame	20.3 – 27.0
	Wood	Green/white	Panel wall	2.0 – 5.6
	Wood	Gray	Window frame	1.9 – 21.0
<b>Building 5</b>				
Open Bays	Wood	Gray/white	Column	1.8 – 3.0
	Brick	White	Walls	7.9 – 11.0
	Wood	White	Window frame	2.1 – 10.0
	Metal	Yellow	Gas pipe	2.0 – 2.5
	Wood	Green/white	Column	1.7 – 2.0

## **2.4 Conclusions and Recommendations**

Based on our findings, SWA offers the following conclusions and recommendations:

1. Elevated levels of LBP were identified at the site. Handling of components that are covered by LBP may require compliance with the OSHA lead standard. To minimize exposure to airborne dust or fume, torch burning, cutting, grinding, or similar high impact work on components covered by LBP should be avoided. Such work would need to be conducted by properly trained workers using appropriate worker protection and engineering controls.
2. For work activities that may generate airborne lead, the contractor(s) should perform an initial exposure assessment in the form of personal air monitoring for each individual task (e.g. demolition, abrasive blasting, and painting) that has the

potential for causing worker exposure to be at or above the OSHA Action Level. In lieu of monitoring, historical data from similar operations may be used to comply with OSHA requirements.

3. Because the site has been abandoned for some time, the building finishes have deteriorated and lead paint chips are prevalent on the floors throughout. SWA recommends that the paint chips and loose and flaking paint be collected prior to the building being demolished to help prevent lead dust and debris from becoming airborne and contaminating the surrounding grounds.
4. Representative samples of building materials scheduled to be land-filled should be collected for TCLP testing to determine if the leachable lead concentrations are greater than five ppm. If so, those materials noted to contain elevated concentrations of lead paint must be segregated for disposal as a hazardous lead waste. In this way it may be possible to reduce the total volume of material requiring disposal as hazardous lead waste. It should be noted that steel and or metal components coated in lead paint are typically recycled.
5. Should painted surfaces be identified at later dates that are not identified in this report, they should be assumed to contain elevated levels of lead until further testing proves otherwise.

## **2.5 Cost Estimates**

Because paint chip debris, loose and flaking paint should be removed before demolition/renovations, there will be costs associated with complying with applicable worker protection, engineering controls, and disposal of lead paint debris. Such costs may include personnel air sampling and analytical fees, additional labor associated with handling components using methods that allow compliance with OSHA, additional waste disposal and testing costs, etc. Such costs are not expected to exceed **\$150,000** for the site. If all or some components required deleading, the costs would increase significantly.

## **3.0 POLYCHLORINATED BIPHENYLS**

### **3.1 Scope of Work**

Typically, the words "No PCBs" are imprinted on the label of individual ballasts if they do not contain PCBs. Because the majority of older ballasts installed before 1978 contain PCBs, if the "No PCBs" wording is not observed, we assume that the ballasts do not contain PCBs. To determine if light ballast contained PCBs, SWA inspected ballast labels associated with each representative type of fluorescent light fixture observed in the buildings.

### **3.2 Findings**

Those representative ballasts inspected by SWA all exhibited the "No PCB" wording on their affixed labels and are assumed not to contain PCB oils in their individual capacitors. One transformer was observed exterior to the buildings. Often local utility companies own the exterior transformers and would be responsible for decommissioning them for recycling and or disposal.

### **3.3 Conclusions and Recommendations**

Based on our observations, SWA concludes the following:

1. Although all ballasts inspected exhibited the "No PCB" wording on the affixed labels, individual ballasts labels must be inspected prior to being impacted to determine the appropriate disposal or recycling requirements. If during renovation, ballasts are identified that do not exhibit the "No PCBs" wording on the affixed labels, they must be collected and properly packaged for disposal or recycling in accordance with the Universal Waste regulatory guidelines. The local utility company should be contacted to see if they are in ownership of the transformer. If the transformer is the responsibility of the property owner, additional investigations will be necessary to determine if the transformer contains PCBs.

### **3.4 Cost Estimates**

Although no PCB containing ballasts were identified at the site, there may be some cost associated with inspecting all ballast labels for the "No PCB" wording. Costs to inspect individual ballasts for the "No PCB" wording on their affixed labels should not exceed \$5,000.

## **4.0 MERCURY COMPONENTS**

### **4.1 Scope of Work**

SWA's observed fluorescent light bulbs throughout the buildings. Typically, when fluorescent light fixtures will be removed and disposed of, SWA makes a conservative assumption that they contain mercury and should be handled as a regulated waste. These materials are classified as "Universal Wastes" and must be appropriately handled and packaged for disposal or recycling.

### **4.2 Findings**

SWA observed approximately 800 fluorescent light bulbs throughout the facility. In addition, we observe broken fluorescent light bulbs on the floors in various locations.

SWA did observe electrical switch-gears in the boiler room that likely contain mercury tubes. There is also manufacturing equipment and heating equipment that may contain mercury tubes.

### **4.3 Conclusions and Recommendations**

Based on our observations, SWA offers the following conclusions and recommendations.

1. Prior to being impacted, all fluorescent light bulbs must be collected and properly packaged for disposal or recycling in a facility permitted to accept such waste. During the dismantling of manufacturing equipment and heating equipment, controls must be inspected for mercury tubes or switches.

### **4.4 Cost Estimates**

The cost to collect and dispose/recycle the fluorescent light bulbs and at this site is not expected to **\$7,500**.

## **5.0 Pigeon Guano and Carcasses**

### **5.1 Scope of Work**

SWA's made observations for pigeon guano and bird or animal carcasses and animal droppings during our inspection. In particular, pigeon guano and carcasses present health concerns in that bacterial spores associated with fungal growth on these materials may be disturbed and become airborne. If infected spores are inhaled, humans may acquire one of three diseases known to be associated with these conditions: Histoplasmosis, Cryptococcosis or in rare occasions Psittacosis. Typically, humans affected by these diseases have compromised immune systems due to other illnesses such as HIV/AIDs or cancer.

### **5.2 Findings**

SWA observed pigeon guano, bird carcasses and animal droppings throughout various locations in the buildings. In particular, SWA observed pigeon guano on the upper floors of Buildings 1 and 5 where the birds were roosting. SWA observed approximately 3,000 sf of pigeon guano and carcasses in various locations. SWA also observed live raccoons living in the boiler house and their droppings were in stairwells, offices and other various locations throughout the facility.

### **5.3 Conclusions and Recommendations**

Based on our observations, SWA offers the following conclusions and recommendations.

1. SWA observed large quantities of bird droppings, raccoon droppings and animal carcasses throughout various locations of Buildings 1 and 5. Because of hazards to human health, these materials must be appropriately handled and packaged for disposal. Typically, asbestos remediation companies will remove these materials under contained conditions using appropriate methods. Workers who remediate guano and body carcasses must wear appropriate personal protective equipment including but not limited to respirators, tyvek suits, rubber boots, gloves and eye protection.
2. Because the birds and animals are entering the building through broken windows and other breeches, SWA recommends that the openings be sealed to prevent the situation from worsening.
3. Because of health concerns relative to inhalation of infected spores, access to the building should be limited to qualified personnel who are wearing proper personal protective equipment including but not limited to disposable suits and respirators with P100 particulate filters.

#### **5.4 Cost Estimates**

SWA estimates that it will cost approximately **\$5,000** to remove the guano, raccoon droppings and carcasses. Asbestos abatement companies normally offer pigeon guano abatement services. Hence, if guano cleanup is combined with asbestos removal, costs may be lowered. At this site the animal droppings will be combined with the asbestos abatement containments and the pricing will be built in to the total price to decontaminate and abate asbestos.

## **6.0 Miscellaneous Hazardous Materials**

### **6.1 Scope of Work**

During SWA's inspection, observations were made for miscellaneous hazardous materials that may require special handling and or disposal during clean up prior to demolition. These include but are not limited to stored solvents, batteries and miscellaneous equipment left in the buildings.

### **6.2 Findings**

SWA observed tanks in the Building 1 basement area. The tanks appear to be empty, but further assessments would be necessary to determine if they require emptying and cleaning prior to being salvaged. Additionally, a car size battery was observed in the basement of Building 5. Further, various types of manufacturing equipment, containers and piles of trash were observed that will need to be better evaluated during remediation. No other miscellaneous hazardous materials were observed. There probably somewhere smashed up amongst the debris.

### **6.3 Conclusions and Recommendations**

Based on our observations SWA offers the following conclusions and recommendations.

1. SWA identified tanks in the basement that may contain liquids. The tanks appear to be empty, but will require further testing to determine for hazardous substances. The tanks must be appropriately cleaned and all contents disposed/recycled by a qualified environmental remediation company. This work must be conducted in accordance with OSHA and RCRA requirements.
2. Because of conditions at the site, SWA does not guarantee that all miscellaneous hazardous materials were identified. If miscellaneous hazardous materials are identified at later dates that are not listed in this report they must be handled and disposed of in accordance with the requirements of all Federal, State and local regulatory requirements.

### **6.4 Cost Estimates**

The cost to collect and dispose/recycle of miscellaneous hazardous materials at the buildings is not expected to exceed **\$2,500.**

## **APPENDIX A**

### ***Certificates of Asbestos Bulk Sample Analysis (PLM)***



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Fax: (978) 346-7265 Phone: (978) 346-4800  
Project: 10165 / 5 West Main St; Chicopee, MA

Customer ID: SMIT50  
Customer PO:  
Received: 08/07/10 9:35 AM  
EMSL Order: 131003868

EMSL Proj:  
Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-01A 131003868-0001	1st Fl Ext Northeast End Window - Gray Caulking	Gray Non-Fibrous Homogeneous		90% Non-fibrous (other)	10% Chrysotile
B1-01B 131003868-0002	2nd Fl East Side - Gray Caulking				Stop Positive (Not Analyzed)
B1-02A 131003868-0003	1st Fl Ext Northeast End Window - Gray Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-02B 131003868-0004	2nd Fl East Side - Gray Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-03A 131003868-0005	1st Fl Northeast End - Black Floor Paper	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected
B1-03B 131003868-0006	2nd Fl West Side - Black Floor Paper	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected

Initial report from 09/09/2010 13:40:42

Analyst(s)

Kevin Pine (44)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. 7 Constitution Way, Suite 107, Woburn MA 01801 Lab Code 101147-0, CT PH-0315, MA AA000188, RI AAL-107T3 and VT AL357102

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			% Fibrous	% Non-Fibrous	% Type
B1-03C 131003868-0007	3rd Fl East Side - Black Floor Paper	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected
B1-04A 131003868-0008	1st Fl West Side By Tanks - Black Fuse Box Panel	Black Fibrous Homogeneous		80% Non-fibrous (other)	20% Chrysotile
B1-05A 131003868-0009	1st Fl by Dryers - Gray Wall Panel Debris	Tan Fibrous Homogeneous		80% Non-fibrous (other)	20% Chrysotile
B1-06A 131003868-0010	1st Fl Bathroom SE Side - Gray 2x4 Ceiling Tile Debris on Floor	Gray Fibrous Homogeneous	40% Cellulose 40% Min. Wool	20% Non-fibrous (other)	None Detected
B1-06B 131003868-0011	3rd Fl Office - Gray 2x4 Ceiling Tile Debris on Floor	Gray Fibrous Homogeneous	40% Cellulose 40% Min. Wool	20% Non-fibrous (other)	None Detected
B1-07A 131003868-0012	1st Fl West Side - White Pipe Insulation debris on Floor	White Fibrous Homogeneous		90% Non-fibrous (other)	10% Chrysotile

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Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-08A 131003868-0013	1st Fl West Side - Tan Textured Paint	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-09A 131003868-0014	3rd Fl East Side Vertical Run - White Pipe Insulation	White Fibrous Homogeneous		90% Non-fibrous (other)	5% Chrysotile 5% Amosite
B1-10A 131003868-0015	3rd Fl Office - Beige 12x12 Floor Tile	Tan Non-Fibrous Homogeneous		98% Non-fibrous (other)	2% Chrysotile
B1-10B 131003868-0016	2nd Fl Office - Beige 12x12 Floor Tile				Stop Positive (Not Analyzed)
B1-11A 131003868-0017	3rd Fl Office - Tan Mastic on B1-10	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-11B 131003868-0018	2nd Fl Office - Tan Mastic on B1-10	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-12A 131003868-0019	Basement Loading Dock - Gray Cement Coat Skim	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

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Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-13A 131003868-0020	Basement - White Tank Insulation	Gray Fibrous Homogeneous		60% Non-fibrous (other)	10% Chrysotile 30% Amosite
B1-14A 131003868-0021	Basement beneath Loading Dock - Gray Ceiling Paper	White Fibrous Homogeneous		30% Non-fibrous (other)	70% Chrysotile
B1-15A 131003868-0022	Rear Loading Dock - Black Rolled Roofing	Black Fibrous Heterogeneous	30% Cellulose	70% Non-fibrous (other)	None Detected
B1-16A 131003868-0023	Roof Stair Tower - Black Wall Flashing on Brick Wall	Black Fibrous Homogeneous		90% Non-fibrous (other)	10% Chrysotile
B1-17A 131003868-0024	Roof South End Main Roof - Black Tar Paper	Black Fibrous Heterogeneous	30% Cellulose 10% Synthetic	60% Non-fibrous (other)	None Detected
B1-17B 131003868-0025	Roof North End Main Roof - Black Tar Paper	Black Fibrous Heterogeneous	30% Cellulose 10% Synthetic	60% Non-fibrous (other)	None Detected
B1-18A 131003868-0026	Roof South End Main Roof - Red Tar Paper	Brown Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (other)	None Detected

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Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-18B 131003868-0027	Roof North End Main Roof - Red Tar Paper	Brown Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (other)	None Detected
B1-19A 131003868-0028	3rd Fl NW Side a/w Metal/FG Windows - Black Window Glazing	Gray Non-Fibrous Homogeneous		96% Non-fibrous (other)	5% Chrysotile
B1-19B 131003868-0029	2nd Fl W Side a/w Metal/FG Windows - Black Window Glazing				Stop Positive (Not Analyzed)
B1-20A 131003868-0030	3rd Fl NW Side Newer - Gray Window Caulking	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-20B 131003868-0031	2nd Fl W Side Newer - Gray Window Caulking	Gray Non-Fibrous Homogeneous		96% Non-fibrous (other)	5% Chrysotile
B1-21A 131003868-0032	3rd Fl Conveyor Walls - White Gypsum Board	Gray/Tan Fibrous Heterogeneous	10% Cellulose	90% Non-fibrous (other)	None Detected

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Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-21B 131003868-0033	3rd Fl Conveyor Walls - White Gypsum Board	Gray/Tan Fibrous Heterogeneous	10% Cellulose	90% Non-fibrous (other)	None Detected
B1-22A 131003868-0034	3rd Fl North West Office - Tan Interior Window Glazing	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-22B 131003868-0035	2nd Fl Office - Tan Interior Window Glazing	White Non-Fibrous Homogeneous		98% Non-fibrous (other)	2% Chrysotile
B1-23A 131003868-0036	2nd Fl Office - Black Table Top	Black Fibrous Heterogeneous	30% Cellulose	70% Non-fibrous (other)	None Detected
B1-23B 131003868-0037	2nd Fl Office - Black Table Top	Black Fibrous Heterogeneous	30% Cellulose	70% Non-fibrous (other)	None Detected
B1-24A 131003868-0038	1st Fl Bathroom - Tan Ceramic Tile Glue	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-24B 131003868-0039	1st Fl Bathroom - Tan Ceramic Tile Glue	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Initial report from 09/09/2010 13:40:42

Analyst(s)

Kevin Pine (44)

Renaldo Drakes, Laboratory Manager  
 or other approved signatory

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Test Report PLM-7.21.0 Printed: 9/9/2010 1:40:42 PM

6

**EMSL Analytical, Inc.**

7 Constitution Way, Suite 107, Woburn, MA 01801

Phone: (781) 933-8411 Fax: (781) 933-8412 Email: bostonlab@emsl.com

Attn: **Ted Sherry**  
**Smith & Wessel Associates, Inc**  
**8 Church Street**  
**Suite 3**  
**Merrimac, MA 01860**

Customer ID: SMIT50  
 Customer PO:  
 Received: 08/07/10 9:35 AM  
 EMSL Order: 131003868

Fax: (978) 346-7265 Phone: (978) 346-4800  
 Project: 10165 / 5 West Main St; Chicopee, MA

EMSL Proj:  
 Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
 Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-25A 131003868-0040	1st FI Center Section - Gray Dryer Insulation	Gray Fibrous Homogeneous	90% Min. Wool	10% Non-fibrous (other)	None Detected
B1-25B 131003868-0041	1st FI Center Section - Gray Dryer Insulation	Gray Fibrous Homogeneous	90% Min. Wool	10% Non-fibrous (other)	None Detected
B1-25C 131003868-0042	1st FI Center Section - Gray Dryer Insulation	Gray Fibrous Homogeneous	90% Min. Wool	10% Non-fibrous (other)	None Detected
B1-26A 131003868-0043	1st FI Record Storage - Gray Cement Plaster	Gray Fibrous Homogeneous	5% Hair	95% Non-fibrous (other)	None Detected
B1-26B 131003868-0044	1st FI Record Storage - Gray Cement Plaster	Gray Fibrous Homogeneous	5% Hair	95% Non-fibrous (other)	None Detected
B1-26C 131003868-0045	1st FI Record Storage - Gray Cement Plaster	Gray Fibrous Homogeneous	5% Hair	95% Non-fibrous (other)	None Detected
B1-26D 131003868-0046	2nd FI Admin Offices - Gray Boiler House Cement Plaster	Gray Fibrous Homogeneous	5% Hair	95% Non-fibrous (other)	None Detected

Initial report from 09/09/2010 13:40:42

Analyst(s)

Kevin Pine (44)

Renaldo Drakes, Laboratory Manager  
 or other approved signatory

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EMSL Proj:  
Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-26E 131003868-0047	2nd Fl Admin Offices - Gray Boiler House Cement Plaster	Gray Fibrous Homogeneous	5% Hair	95% Non-fibrous (other)	None Detected

Initial report from 09/09/2010 13:40:42

Analyst(s)

Kevin Pine (44)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B5-01A 131003865-0001	1st FI Stairwell Window - Gray Caulking	Gray Non-Fibrous Homogeneous		90% Non-fibrous (other)	10% Chrysotile
B5-01B 131003865-0002	2nd FI West End - Gray Caulking				Stop Positive (Not Analyzed)
B5-02A 131003865-0003	1st FI Stairwell Window - Gray Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-02B 131003865-0004	2nd FI West End - Gray Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-03A 131003865-0005	1st FI West End - Black Floor Paper	Brown Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected
B5-03B 131003865-0006	3rd FI North Side - Black Floor Paper	Brown Fibrous Homogeneous	70% Synthetic	30% Non-fibrous (other)	None Detected
B5-04A 131003865-0007	2nd FI West End - Black Fuse Box Panel	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Initial report from 09/09/2010 11:21:08

Analyst(s)

Kevin Pine (19)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B5-05A 131003865-0008	3rd Fl West Side - Gray Cement Plaster	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-05B 131003865-0009	3rd Fl South Side - Gray Cement Plaster	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-05C 131003865-0010	3rd Fl North Side - Gray Cement Plaster	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-06A 131003865-0011	Roof North Side - Gray Roof Seam Flashing	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-06B 131003865-0012	Roof South Side - Gray Roof Seam Flashing	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-07A 131003865-0013	Roof West End under 1st Lyr Wood - Red Tar Paper	Brown/Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected
B5-07B 131003865-0014	Roof Middle under 1st Lyr Wood - Red Tar Paper	Brown Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected

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Analyst(s)

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EMSL Proj:  
 Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
 Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B5-08A 131003865-0015	Roof - Black Roof Drain Flashing	Black Non-Fibrous Homogeneous		80% Non-fibrous (other)	20% Chrysotile
B5-08B 131003865-0016	Roof - Black Roof Drain Flashing				Stop Positive (Not Analyzed)
B5-09A 131003865-0017	1st Fl Dust Vent Room - White Wall Panels	White Fibrous Homogeneous	2% Glass	98% Non-fibrous (other)	None Detected
B5-09B 131003865-0018	1st Fl Dust Vent Room - White Wall Panels	White Fibrous Homogeneous	2% Glass	98% Non-fibrous (other)	None Detected
B5-10A 131003865-0019	Roof Rear Stair Roof - Black Roofing Felt	Black Fibrous Heterogeneous	70% Cellulose	30% Non-fibrous (other)	None Detected
B5-10B 131003865-0020	Roof Rear Stair Roof - Black Roofing Felt	Black Fibrous Heterogeneous	70% Cellulose	30% Non-fibrous (other)	None Detected
B5-11A 131003865-0021	Roof Rear Stair Roof - Gray Wall Flashing	Black Fibrous Homogeneous		80% Non-fibrous (other)	20% Chrysotile

Initial report from 09/09/2010 11:21:08

Analyst(s)

Kevin Pine (19)

Renaldo Drakes, Laboratory Manager  
 or other approved signatory

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Test Report PLM-7.21.0 Printed: 9/9/2010 11:21:08 AM

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EMSL Proj:  
Analysis Date: 9/9/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B5-11B 131003865-0022	Roof Rear Stair Roof - Gray Wall Flashing				Stop Positive (Not Analyzed)

Initial report from 09/09/2010 11:21:08

Analyst(s)

Kevin Pine (19)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Test Report PLM-7.21.0 Printed: 9/9/2010 11:21:08 AM

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EMSL Proj:  
Analysis Date: 9/20/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-27A 131004012-0001	Basement Loading Dock - Gray Cement Skim Coat	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-27B 131004012-0002	Basement Loading Dock - Gray Cement Skim Coat	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-28A 131004012-0003	Basement Loading Dock - Gray Window Glazing	Tan Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-28B 131004012-0004	1st Fl - Gray Window Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-29A 131004012-0005	Basement - White/Gray Textured Paint	Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-29B 131004012-0006	2nd Fl - White/Gray Textured Paint	Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B1-30A 131004012-0007	Mezz Boiler Rm - Gray Duct Insulation	Gray Fibrous Homogeneous		66% Non-fibrous (other)	35% Chrysotile

Initial report from 09/20/2010 12:59:22

Analyst(s)

Steve Grise (11)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Test Report PLM-7.21.0 Printed: 9/20/2010 12:59:22 PM

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EMSL Proj:  
Analysis Date: 9/20/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B1-31A 131004012-0008	1st Fl Dock Roof - Black Roofing Felt	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (other)	None Detected
B1-32A 131004012-0009	Boiler Rm - Tan	Tan Fibrous Homogeneous	35% Min. Wool 5% Wollastonite	60% Non-fibrous (other)	None Detected
B1-32B 131004012-0010	Boiler Rm - Tan	Tan Fibrous Homogeneous	35% Min. Wool 5% Wollastonite	60% Non-fibrous (other)	None Detected
B1-32C 131004012-0011	Boiler Rm - Tan	Tan Fibrous Homogeneous	35% Min. Wool 5% Wollastonite	60% Non-fibrous (other)	None Detected

Initial report from 09/20/2010 12:59:22

Analyst(s)

Steve Grise (11)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Project: 10165 / 5 West Main St; Chicopee; Building 5

EMSL Proj:  
Analysis Date: 9/20/2010

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using  
Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
B5-12A 131004005-0001	1st Fl East - Black Power Box	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
B5-13A 131004005-0002	1st Fl North - Gray Window Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	<1% Chrysotile
B5-13B 131004005-0003	1st Fl East - Gray Window Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	<1% Chrysotile

Initial report from 09/20/2010 13:13:38

Analyst(s)

Steve Grise (3)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Project: 10165 / 5 West Main Street; Chicopee; Bldg 1

EMSL Proj:  
Analysis Date: 9/22/2010

**Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM**  
**via EPA/600/R-93/116 Section 2.5.5.1**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES
B1-28A 131004012-0003	Basement Loading Dock - Gray Window Glazing	White Non-Fibrous Homogeneous	100.0	None	No Asbestos Detected

Report Amended: 09/22/2010 11:40:58 Replaces the Initial Report 09/20/2010 12:59:22. Reason Code: Client-Additional Analysis

Analyst(s)

Allison Small (1)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

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Customer ID: SMT50  
Customer PO:  
Received: 09/07/10 9:35 AM  
EMSL Order: 131003868

Fax: (978) 348-7265 Phone: (978) 348-4800  
Project: 10165 / 5 West Main St; Chicopee, MA

EMSL Proj:  
Analysis Date: 9/22/2010

**Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM**  
**via EPA/600/R-93/116 Section 2.5.5.1**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES
B1-02A 131003868-0003	1st Fl Ext Northeast End Window - Gray Glazing	White Non-Fibrous Homogeneous	100.0	None	No Asbestos Detected
B1-11A 131003868-0017	3rd Fl Office - Tan Mastic on B1-10				
	Insufficient Material				

Report Amended: 09/22/2010 11:33:57 Replaces the Initial Report 09/09/2010 13:40:42. Reason Code: Client-Additional Analysis

Analyst(s)

Allison Small (1)

Renaldo Drakes, Laboratory Manager  
or other approved signatory

This laboratory is not responsible for % asbestos in total sample when the residue only is submitted for analysis. The above report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL Analytical, Inc. Samples received in good condition unless otherwise noted.  
Samples analyzed by EMSL Analytical, Inc. 7 Constitution Way, Suite 107, Woburn MA

Test Report EPANOB-7.21.0 Printed: 9/22/2010 12:23:38 PM

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**EMSL Analytical, Inc.**

7 Constitution Way, Suite 107, Woburn, MA 01801

Phone: (781) 933-8411 Fax: (781) 933-8412 Email: [bostonlab@emsl.com](mailto:bostonlab@emsl.com)

Attn: **Ted Sherry**  
**Smith & Wessel Associates, Inc**  
**8 Church Street**  
**Suite 3**  
**Merrimac, MA 01860**

Customer ID: SMT50  
Customer PO:  
Received: 08/16/10 9:50 AM  
EMSL Order: 131004005

Fax: (978) 348-7265 Phone: (978) 348-4800  
Project: 10165 / 5 West Main St; Chicopee; Building 5

EMSL Proj:  
Analysis Date: 9/22/2010

**Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM**  
**via EPA/600/R-93/116 Section 2.5.5.1**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES
B5-13A 131004005-0002	1st Fl North - Gray Window Glazing	Gray Non-Fibrous Homogeneous	100.0	None	No Asbestos Detected

Report Amended: 09/22/2010 11:37:17 Replaces the Initial Report 09/20/2010 13:13:38. Reason Code: Client-Additional Analysis

Analyst(s)

Allison Small (1)

Renaldo Drakes, Laboratory Manager  
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Test Report EPANOB-7.21.0 Printed: 9/22/2010 12:25:10 PM

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## **APPENDIX B**

### ***Results of Testing for Lead Based Paint (LBP)***

<b>Lead Based Paint Testing Results</b> Former Facemate Corporation 5 West Main Street, Chicopee, MA				
Location	Substrate	Color	Component	Result mg/cm <sup>2</sup>
<b>Building 1</b>				
Floor 1 - Throughout	Brick	Green	Wall	<b>2.5</b>
	Wood	White	Window frame	<b>30.1 – 31.3</b>
	Wood	Green/white	Support columns	<b>2.4 – 30.5</b>
	Concrete	Gray	Vat wall (outer)	0.2
	Concrete	White	Vat wall (inner)	0.1 – 0.8
	Brick	White	Wall	<b>0.1 – 1.1</b>
	Metal	Dark gray	Sliding door	<b>10.5 – 14.9</b>
	Metal	Silver	Dryer machine	0.2 – 0.3
	Wood	White	Baluster	0.2 – 0.9
	Wood	Gray	Hand rail	0.2 – 0.3
	Wood	Brown	Floor	0.1 – 0.2
Floor 2 - Throughout	Brick	White	Wall	<b>2.0 – 3.7</b>
	Wood	White	Window frame	<b>0.9 – 25.3</b>
	Wood	Gray	Lower column	<b>5.0 – 28.9</b>
Floor 3 - Throughout	Wood	White	Window frame	<b>20.3 – 27.0</b>
	Wood	Green/white	Panel wall	<b>2.0 – 5.6</b>
	Wood	Green	Stairs	0.1 – 0.3
	Brick	White	Wall	0.1 – 0.3
Basement	Brick	Gray/white	Wall	0.1 – 0.7
	Wood	Gray	Window frame	<b>1.9 – 21.0</b>
<b>Building 5</b>				
	Wood	Gray/white	Column	<b>1.8 – 3.0</b>
	Brick	White/gray	Walls	0.1 – 0.5
	Brick	White	Walls	<b>7.9 – 11.0</b>
	Wood	White	Window frame	<b>2.1 – 10.0</b>
	Metal	Yellow	Gas pipe	<b>2.0 – 2.5</b>
	Brick	White	Wall	0.1 – 0.7
	Wood	Green/white	Column	<b>1.7 – 2.0</b>

